

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF SOUTH CAROLINA  
SPARTANBURG DIVISION

JANE DOES 1-9,

Plaintiffs,

v.

COLLINS MURPHY, SHARON HAMMONDS,  
BRENDA F. WATKINS, LIMESTONE  
UNIVERSITY, MG, FREESITES, LTD., d/b/a  
PORNHUB.COM, MG FREESITES II LTD.,  
MINDGEEK S.A.R.L., MINDGEEK USA, INC.,  
MG BILLING LTD., and HAMMY MEDIA  
LTS. d/b/a XHAMSTER.COM,  
TRAFFICSTARS LTD., WISEBITS LTD.,  
XHAMSTER IP HOLDINGS LTD., WISEBITS  
IP LTD.,

Defendants.

Civil Action Number: 7:20-cv-00947-DCC

**APPLICATION/AFFIDAVIT  
PRO HAC VICE ADMISSION**

JANE DOE,

Plaintiff,

vs.

LIMESTONE UNIVERSITY F/K/A  
LIMESTONE COLLEGE, COLLINS MURPHY,  
MG FREESITES, LTD., D/B/A  
PORNHUB.COM, and HAMMY MEDIA LTD.  
d/b/a XHAMSTER.COM,

Defendants.

CASE NO.: 7:21-cv-03193-DCC

**APPLICATION/AFFIDAVIT  
PRO HAC VICE ADMISSION**

JANE DOE 1, JANE DOE 2, JOHN DOE 1, and  
JOHN DOE 2,

Plaintiffs,

v.

COLLINS MURPHY; LIMESTONE  
UNIVERSITY; BRENDA F. WATKINS;  
SHARON HAMMONDS; and MG FREESITES,  
LTD. D/B/A PORNHUB.COM,

Defendants.

CASE NO. 7:22-CV-03576-DCC

**APPLICATION/AFFIDAVIT  
PRO HAC VICE ADMISSION**

- (1) Name Michael Ernest Williams  
First Middle Last
- (2) Residence. I reside in the following state: California  
If a South Carolina resident, indicate months/years of residence: \_\_\_\_\_
- (3) Business Address. I am an attorney and practice law under the name of or as a member of the following firm:
- Firm name: Quinn Emanuel Urquhart & Sullivan, LLP  
Mailing address: 865 S. Figueroa St., 10<sup>th</sup> Floor  
City/State/Zip: Los Angeles, CA, 90017  
Telephone number: (213) 443-3000  
Facsimile number: (213) 443-3100  
E-mail address: michaelwilliams@quinnemanuel.com  
(Application will not be considered without an e-mail address to receive electronic notification.)
- (4) Jurisdiction of this Court. I, by execution of this Application and Affidavit, consent and agree to comply with the applicable statutes, laws, and rules of the State of South Carolina, with all applicable federal statutes, laws, and rules, including Local Rules of the United States District Court for the District of South Carolina (particularly, Local Civil Rule 83.I.08 and/or Local Criminal Rule 57.I.08). I consent to the jurisdiction of the United States District Court for the District of South Carolina in all matters of attorney conduct.<sup>1</sup>
- (5) Regular Practice of Law. I am a member in good standing of the bar of the highest court of the District of Columbia or the State of California where I regularly practice law.  
**Attached is my certificate of good standing.**

<sup>1</sup>This District maintains a web site ([www.scd.uscourts.gov](http://www.scd.uscourts.gov)) from which the federal and local rules of procedure and related materials may be obtained.

- (6) Additional Bar Membership. I have been admitted to practice before the following courts: (List all of the courts Applicant has been admitted to practice before: United States District Courts; United States Circuit Courts of Appeals; the Supreme Court of the United States; and courts of other states or the District of Columbia.) By signing this Affidavit, I certify that I am a member in good standing of each of the listed bars unless otherwise noted.

**Court Date Admitted****Good Standing**

State Bar of California	12/01/1995	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
U.S. Court of Appeals Ninth Circuit	12/01/1996	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
United Court of Federal Claims	06/01/1998	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
U.S. District Court, Central District of California	05/01/2001	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
U.S. District Court, Southern District of California	07/01/2002	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
U.S. District Court, Northern District of California	05/01/2003	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
U.S. District Court, Eastern District of California	05/01/2003	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
U.S. District Court, Western District of Michigan	08/01/2003	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
U.S. District Court, Colorado	04/27/2004	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
U.S. Court of Appeals for the Federal Circuit	04/28/2006	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No

- (7) Pending Disciplinary Matters. Are you presently the subject of any formal suspension or disbarment proceedings, and have you been notified by any disciplinary agency of the initiation of formal procedures? ☐ Yes ☒ No  
(If "yes," give particulars, such as jurisdiction, court, date, grounds. Information to comply with this paragraph may be provided *in camera* but that fact shall be revealed below.)

- (8) Curtailment of Prior *Pro Hac Vice* Admissions. Have you ever had any application for admission *pro hac vice* in this or any other jurisdiction denied or any *pro hac vice* admission revoked? ☐ Yes ☒ No  
(If "yes," give particulars, such as date, court, docket number, judge, circumstances; attach a copy of any order of denial or revocation.)

- (9) Sanctions. Have you ever had any certificate or privilege to appear and practice before any judicial or administrative body suspended or revoked, or received a public reprimand or greater sanction? ☐ Yes ☒ No  
(If "yes," give particulars, e.g., judicial or administrative body, date of suspension, and reinstatement.)

- (10) Criminal Sanctions. Have you ever been convicted of a felony under the laws of the District of Columbia or of any State or under the laws of the United States? ☐ Yes ☒ No  
(If "yes," give particulars, such as date, court, judge, circumstances, and ultimate disposition.)



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- (11) Present and Previous *Pro Hac Vice* in this Court. Have you, within the last ten (10) years, filed an application to appear *pro hac vice* in the United States District Court for the District of South Carolina or another court in the state of South Carolina?

☒ Yes ☐ No

(If “yes,” give court, case name, docket number, and status of litigation, year of application, local counsel of record in each case, and state whether application is pending or was granted.) Attach additional pages if necessary.

Michael Kirby v. Red Bull North America Inc., Case No. 3:19-cv-02701-CMC, litigation closed Applied in January 2020 and application was granted. Local counsel of record was Steve Pugh at Richardson Plowden & Robinson.

- (12) Designated Local Counsel. Local counsel of record associated with Applicant in this case is:

TURNER, PADGET, GRAHAM AND LANEY, P.A.  
Post Office Box 1473  
Columbia, South Carolina 29202  
facsimile | 803-400-1542

Mark B. Goddard | Attorney ID: 09194  
email | mgoddard@turnerpadget.com  
direct | 803-227-4334

J. Kenneth Carter | Attorney ID: 05108  
email | kcarter@turnerpadget.com  
direct | 864-552-4611

I understand that local counsel of record is required to: (1) personally sign each pleading, motion, discovery procedure, or other document served or filed in this Court; (2) accept service of all pleadings and notices as required on behalf of all counsel for the party represented; (3) be present at all pretrial conferences, hearings and trials, unless excused by the Court; (4) be prepared to participate actively as may be necessary; and (5) assure compliance with Local Civil Rules 83.I.04, 83.I.05, and 83.I.06 or Local Criminal Rules 57.I.04, 57.I.05, and 57.I.06 as appropriate. Local counsel of record may attend discovery proceedings.

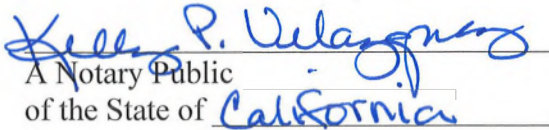
- (13) Associated Counsel. In addition to local counsel designated above, the following counsel are also associated with the undersigned in this case.
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- (14) Application Fee. I affirm that the application fee of three hundred and fifty dollars (\$350) has been paid in accordance with Local Civil Rule 83.I.05 or Local Criminal Rule 57.I.05 or paid herewith.
- (15) Electronic Notification. By submitting this application, I consent to electronic notification.
- (16) Represented Party/Parties. I seek to represent the following party/parties: MG Freesites, LTD., MG Freesites II LTD., MindGeek S.A.R.L., MindGeek USA, Inc., MG Billing LTD.

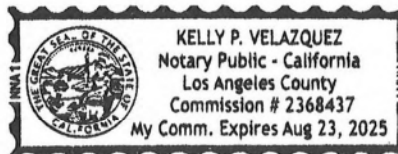
(17) I certify that I have read Local Civil Rule 30.04 regarding the conduct of depositions.

  
Signature of Applicant

Sworn to and subscribed before me  
this 20<sup>th</sup> day of October, 20 23.

  
A Notary Public  
of the State of California

My Commission expires: 8/23/25



**CALIFORNIA JURAT WITH AFFIANT STATEMENT**

**GOVERNMENT CODE § 8202**

- ☒ See Attached Document (Notary to cross out lines 1-6 below)  
☐ See Statement Below (Lines 1-6 to be completed only by document signer[s], *not* Notary)

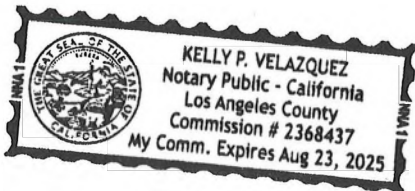
1 \_\_\_\_\_  
2 \_\_\_\_\_  
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5 \_\_\_\_\_  
6 \_\_\_\_\_

Signature of Document Signer No. 1      Signature of Document Signer No. 2 (if any)

A notary public or other officer completing this certificate verifies only the identity of the individual who signed the document to which this certificate is attached, and not the truthfulness, accuracy, or validity of that document.

State of California

County of Los Angeles



Place Notary Seal Above

Subscribed and sworn to (or affirmed) before me

on this 20th day of October, 2023,  
by      Date      Month      Year

(1) Michael Ernest Williams

(and (2) \_\_\_\_\_),  
Name(s) of Signer(s)

proved to me on the basis of satisfactory evidence  
to be the person(s) who appeared before me.

Signature: Kelly P. Velazquez  
Signature of Notary Public

**OPTIONAL**

Though this section is optional, completing this information can deter alteration of the document or fraudulent reattachment of this form to an unintended document.

**Description of Attached Document**

Title or Type of Document: \_\_\_\_\_ Document Date: \_\_\_\_\_

Number of Pages: \_\_\_\_\_ Signer(s) Other Than Named Above: \_\_\_\_\_